

DATA PRIVACY NOTICE

Last update: September 10th, 2026

INTRODUCTION



SENIOR SISTEMAS S.A., registered under CNPJ No. 80.680.093/0001-81, headquartered at Rua São Paulo, 825, Bairro Victor Konder, CEP 89.012-001, Blumenau/SC, Brazil, including its parent company and branches, hereinafter referred to as **SENIOR GROUP**, is a software company with 37 years of experience in the market. Committed to privacy and data protection, SENIOR GROUP presents this **Data Privacy Notice** in compliance with the **General Data Protection Law (LGPD)**, its Portuguese acronym).

This document aims to reaffirm **SENIOR GROUP**'s commitment to transparency, security, and compliance in the processing of personal data, as well as to establish the guidelines adopted to ensure the protection of information of Data Subjects.

This Privacy Notice is part of SENIOR GROUP's comprehensive Data Privacy Governance Program, which reflects best practices, internal controls, and technical and organizational measures aimed at ensuring the integrity, confidentiality, and availability of personal data processed in the scope of our activities.

SCOPE AND APPLICABILITY

This Privacy Notice covers all business units of **SENIOR GROUP**, as well as third parties that process personal data on behalf of or at the request of SENIOR GROUP, including, but not limited to, Distribution Channels, PJ Consultants, Alliance and Platform Partners, and other suppliers.

In addition to establishing guidelines for the processing of personal data, this Notice reinforces **SENIOR SISTEMAS S.A.**'s commitment to corporate governance in privacy and data protection, ensuring the adoption of practices aligned with the General Data Protection Law (LGPD) and other applicable regulations.

Companies acquired by **SENIOR GROUP** may adopt their own privacy policies on their websites, provided they are compatible with the principles and guidelines established in this document and in compliance with current legislation. Compliance with this Notice is mandatory for all parties involved in the processing of personal data, ensuring alignment with applicable legal and regulatory requirements.



This Notice does not replace nor supersede other policies published by **SENIOR GROUP**, but applies concurrently or subsidiarily when applicable, especially with regard to the [Information Security Policy](#) and the [Cookies Policy](#), all of which are available through [our website](#).

DEFINITIONS

ACQUIRED – Companies incorporated into **SENIOR GROUP**, which may have their own privacy policies, provided they are compatible with the guidelines established by the organization.

DISTRIBUTION CHANNELS – Companies duly accredited and authorized to market, implement, and offer support for solutions, which may in some cases process personal data on behalf of **SENIOR GROUP**.

CLIENT – A legal entity that acquires products and services from **SENIOR GROUP** and acts as a Data Controller, as defined in the LGPD.

MEMBER OF PERSONNEL – A professional linked to **SENIOR GROUP**, whether an employee, intern, or temporary contractor, who may, in the exercise of their functions, have access to personal data.

PJ CONSULTANTS – Self-employed professionals or companies duly accredited by **SENIOR GROUP** who provide specialized services in implementation projects, migration, customization, training, project management, or other consulting services. In the performance of their functions, these professionals may process personal data, always in compliance with the guidelines and contractual requirements established by **SENIOR GROUP**.

CONTROLLER – A natural or legal person responsible for making decisions regarding the processing of personal data, as defined in the **LGPD**.

DATA PROTECTION OFFICER (DPO) – A professional appointed by **SENIOR GROUP** to serve as a communication channel between the organization, Data Subjects, and the Brazilian National Data Protection Authority (ANPD), and to provide guidance on compliance practices with the **LGPD**.

SUPPLIER – A company or professional hired to supply products or services to **SENIOR GROUP** and may, in certain situations, process personal data.

PROCESSOR – A natural or legal person who processes personal data on behalf of the Controller, in accordance with the instructions received and in compliance with the **LGPD**.

PLATFORM PARTNER – Companies that integrate their technological solutions with the products and services of **SENIOR SISTEMAS S.A.**, and may process personal data according to the terms established in signed contracts.

ALLIANCE PARTNERS – Strategic companies that establish commercial and technological collaborations with **SENIOR GROUP**, and may, in some cases, have access to personal data within the scope of the partnership.

DATA SUBJECT – A natural person to whom the personal data processed by **SENIOR GROUP** refers, including customers, members of personnel, suppliers, or any other individual whose data is processed by the organization.

SENIOR SISTEMAS – PERSONAL DATA PROCESSOR

SENIOR GROUP processes personal data in accordance with the terms of the service provision contract signed with the Controller (client), within the applicable operational and legal limits. All activities are conducted in compliance with the General Data Protection Law (LGPD), ensuring the security and protection of the information processed.

SENIOR GROUP may process **personal data** upon request of the Controller, provided such processing is compatible with the contractual obligations and the principles established in the General Data Protection Law (LGPD). In the context of using the products and services provided by **SENIOR GROUP**, clients may process and store personal data of different data subjects, such as their own members of personnel, customers, suppliers, and other third parties.

These data subjects do not have any direct relationship with **SENIOR GROUP**, which acts exclusively as a personal data Processor, providing the technological infrastructure and systems used by clients under a SaaS (Software as a Service) model. Thus, **SENIOR GROUP** does not define the purposes or means of processing personal data processed by customers, and always acts in accordance with documented instructions and **contractual terms established between the parties**, in compliance with the General Data Protection Law (LGPD).

Processing is carried out in observance of **specific purposes and applicable security and protection measures**, as detailed in the Senior Documentation Portal and in the Information Security Manual, which provides technical information about each product and their respective privacy practices. **SENIOR GROUP** adopts a solid structure of Data Privacy Governance, Information Security and Cloud Security, supported by policies, technical controls and internal processes that ensure the protection of processed information.

To ensure transparency and trust, all practices and guidelines that make up this governance model are available on the **Senior Sistemas Documentation Portal**, where clients can consult the **Data Privacy and Information Security Manual** for Senior Sistemas Customers, as well as other related materials.

SENIOR SISTEMAS – PERSONAL DATA CONTROLLER

In certain products offered by **SENIOR GROUP**, we may act as a personal data controller, assuming responsibility for decisions regarding the processing of this information. In these cases, processing occurs in accordance with previously defined purposes and in compliance with the LGPD.

To obtain detailed information about which products or services **SENIOR GROUP** acts as a Controller, as well as the respective personal data processing activities, clients and users may consult the specific documentation available on the **Documentation Portal**.

DATA AND INFORMATION PROTECTION

SENIOR GROUP values privacy and the protection of personal data, committing itself to fully comply with the General Data Protection Law (LGPD) and other applicable legislation. Our approach to ensuring the security and confidentiality of information is based on good governance practices, robust internal policies and advanced technical protection measures.

To this end, we adopt a Privacy and Data Protection Governance Program structured around four essential pillars. The first is organizational **CULTURE**, aimed at awareness and continuous training of members of personnel and third parties on the importance of privacy. The second is the incorporation of **PRIVACY BY DESIGN** principles, ensuring that privacy is integrated from the conception of products, systems and internal processes. The third pillar is **DATA COMPLIANCE AND GOVERNANCE**, which encompasses audits, constant review of policies and compliance with regulatory standards; and the fourth is **CONTINUOUS IMPROVEMENT**, which ensures that we are constantly improving our processes and procedures involving data privacy.

SENIOR GROUP has implemented several measures to ensure the protection, integrity and security of personal data, establishing access controls aligned with privacy best practices. Access is permitted only to authorized individuals, as required by operational necessity and for support and other service activities, always respecting the principles present in the LGPD. Furthermore, we adopt internal procedures to ensure that all areas responsible for processing personal data do so in a safe, ethical and fully compliant manner with the organization's guidelines and applicable legislation.

To ask questions or request additional information about this Data Privacy Notice, data subjects may contact the Data Protection Officer (DPO) directly by email at encarregado@senior.com.br. **SENIOR GROUP** reaffirms its commitment to privacy and data security, continuously improving its policies and practices to ensure a reliable and secure digital environment for all its customers, members of personnel, and partners.

PERSONAL DATA PROCESSED

In the context of its business and operational activities, SENIOR GROUP, as a Data Controller, establishes the purposes and means of processing information collected within the scope of its relationships with customers, partners, suppliers and other data subjects.

During the provision of the service, we may process the following personal data, not limited to these:

- Full name;
- Personal taxpayer identification number (CPF, Brazilian tax ID, or local equivalent);
- Personal and/or professional email;
- Personal and/or professional telephone;
- Position and area of activity;
- Residential and/or professional address;
- Consumption habits;
- Navigation data (IP address, city, location, and browser name);

In specific situations, sensitive personal data may be processed, such as:

- Image;
- Voice;
- Videos;
- Preferred name;
- Gender identity;
- Information about physical, visual, hearing, intellectual, or mobility disabilities;
- Data related to participation in events, training sessions, and institutional actions.

The processing of this information occurs in a manner compatible with the legitimate purposes of SENIOR GROUP, respecting the principles of necessity, adequacy, and transparency, and strictly observing the technical and organizational security measures adopted by the company.

PURPOSES

Personal data is processed for legitimate purposes and compatible with the expectations of Data Subjects, always in a proportional manner and limited to the purpose of collection.

Personal data may be used for the purposes set forth below, provided they remain compatible with such purposes:

- Establish contact with potential customers and business partners, including for the presentation of products, solutions, and business opportunities.
- Promote marketing campaigns and institutional communication, adapting the content and format of messages to the profile and interests of the audience that interacts with SENIOR GROUP brands.
- Generate commercial demand through lead capture on websites, applications, and digital forms, as well as through the use of paid media to attract potential customers interested in the solutions.

- Analyze navigation behavior and interaction with digital channels to improve user experience and increase the effectiveness of communication and sales actions.
- Record and disclose institutional actions and events promoted by the company, including the use of images, videos, and voice recordings in promotional materials, podcasts, institutional videos, and marketing campaigns.
- Manage commercial relationships and prospect for new business by performing internal contact categorization, profile analysis, and processing of commercial opportunities in a manner compatible with the LGPD.

Processing shall be conducted on the basis of adequate legal grounds, observing the principles of necessity, transparency, and purpose, and in compliance with the company's internal privacy and information security policies.

LEGAL BASES FOR DATA PROCESSING

Personal data shall be processed in accordance with applicable legal bases, observing the principles of necessity, adequacy, and transparency. Depending on the nature of the relationship and the specific purpose, processing activities may occur on the basis of one or more of the following legal grounds:

Legitimate Interest:

Processing is used in situations where it is necessary to support and promote institutional and commercial activities, such as marketing actions, communication, lead generation, prospecting for new business, and improvement of user experience on digital channels. In these cases, the legitimate expectations of Data Subjects are considered, and a balance is struck between individual rights and the company's interests.

Execution of Contract or Preliminary Procedures:

Applicable when processing is necessary to enable negotiation, execution, or maintenance of contracts with customers, suppliers, and commercial partners, including compliance with requests made through official contact channels.

Consent:

Processing is used in situations involving the use of image, voice, videos, and other personal content for institutional disclosure, events, marketing campaigns, or promotional communications, always with the free, informed, and unambiguous authorization of the Data Subject.

Regardless of the applicable legal basis, personal data shall be processed with transparency and in compliance with the company's internal policies on privacy and information security, ensuring that the Data Subject maintains control over and trust in the use of their information.

RIGHTS OF DATA SUBJECTS

Personal data shall be processed in strict compliance with the legal bases provided for in the General Data Protection Law (LGPD), ensuring that all activities are supported by an adequate legal basis compatible with the purposes disclosed to the Data Subject.

SENIOR GROUP shall ensure that all processing is conducted in a transparent, legitimate, and proportionate manner, respecting **the rights of Data Subjects** provided for in **Article 18 of the LGPD** (Brazilian data protection law), including, among others, the right of access, correction, deletion, portability, information on sharing, and revocation of consent when applicable.

Processing operations are constantly evaluated for their adequacy to the declared purposes, the principle of necessity, and the security and governance measures adopted by the company, ensuring that the use of personal data occurs within the legal and ethical limits that guide the performance of **SENIOR GROUP**.

INTERNATIONAL DATA TRANSFER

SENIOR GROUP may conduct international transfers of personal data where necessary for the execution of its activities, provision of services, use of technologies, or compliance with contractual obligations. Such transfers shall be conducted in compliance with the General Data Protection Law (LGPD) and the guidelines established by ANPD Resolution CD/ANPD No. 19/2024 (Brazilian regulation governing international data transfer mechanisms).

SENIOR GROUP ensures that all international transfers shall be performed only to countries or organizations that provide an adequate level of personal data protection, as determined by the Brazilian National Data Protection Authority (ANPD), and through the adoption of appropriate safeguards, such as:

- Specific or standard contractual clauses, which obligate the data recipients to observe the principles, rights, and guarantees provided for in Brazilian data protection legislation;
- Technical and organizational security measures capable of protecting personal data against unauthorized access, incidents, and improper processing.

The international transfer processes are evaluated and reviewed periodically to ensure that they remain aligned with the best practices in privacy, information security, and corporate governance adopted by **SENIOR GROUP**.

INTERNATIONAL DATA TRANSFER AND OUR PRODUCTS

Our platform was developed with a focus on security, compliance, and protection of personal data for all users. We therefore transparently inform how the processing and possible international transfer of information occurs, as provided in articles 33 to 36 of the General Data Protection Law (LGPD).

Where data is stored

The application's main database, including data at rest and transactional data, is located in Brazil. This means that all essential platform information remains within national territory, following Brazilian data protection standards and regulations.

Use of APIs and international services

Some functionalities of our solution use APIs and Artificial Intelligence services provided by global technology partners, such as Google, Amazon Web Services (AWS), Microsoft, and other globally recognized providers.

These services may perform data processing in data centers located outside Brazil, which is characterized by the LGPD as **international data transfer**.

Security, compliance, and reliability

We emphasize that all our partners meet the highest international standards for security, privacy, and compliance, including certifications such as:

- ISO/IEC 27001
- SOC 2 – Type II
- Advanced encryption in transit and at rest
- Rigorous access controls
- Periodic independent audits

Furthermore, we work only with providers that implement adequate safeguards required by the LGPD, such as specific contractual clauses, equivalent protection standards, and mechanisms that ensure Data Subject security.

Commitment to data protection

Our commitment is to ensure that any international transfer is carried out securely, transparently, and in accordance with legal requirements. We continue to enhance our processes and technologies to preserve the privacy and protection of our customers' information at all stages.

If you have any questions or would like more details about our Privacy Policy and our data processing practices, please contact our team.

PERSONAL DATA SHARING

Personal data may be shared with third parties only to the extent necessary for fulfillment of the stated purposes and the full functioning of the company's operational, commercial, and institutional activities.

This sharing occurs in a controlled and secure manner with partners and suppliers that provide technology, communication, marketing, data analysis, hosting, customer service, audit, and administrative support services, among others. All recipients are contractually obligated to ensure the confidentiality, integrity, and protection of personal data and to use it exclusively for the agreed purposes.

SENIOR GROUP adopts rigorous technical and legal criteria for the selection and monitoring of these third parties to ensure that all comply with the company's internal privacy and information security practices and policies in accordance with the General Data Protection Law (LGPD).

Data Subjects may request detailed information at any time about the categories of third parties with whom their personal data is shared by contacting the Data Protection Officer (DPO) through the channels indicated in this Notice.

CHANGES TO THIS DOCUMENT

SENIOR GROUP reserves the right to modify this document whenever it deems necessary to fulfill the stated purposes. The date of the last update will be informed at the beginning of the document.

DATA PROTECTION OFFICER

SENIOR GROUP maintains a formal Privacy and personal data Protection Governance structure coordinated by **Jean Carlo Corrêa Gomes** and **Bernardo Neiva Agnes**, who serve as Data Protection Officers (DPO) of the organization.

The Data Protection Officer is responsible for guiding members of personnel and partners, overseeing compliance with personal data processing practices, and serving as a communication channel between Data Subjects, the company, and the Brazilian National Data Protection Authority (ANPD).

All communications received are handled with confidentiality, responsibility, and in accordance with the deadlines established by the General Data Protection Law (LGPD) and the guidelines of **SENIOR GROUP's** Privacy and personal data Protection Governance Program.

If you have concerns about your privacy, wish to lodge a complaint, have a question or request related to this matter, or wish to exercise any of the rights provided under applicable legislation, contact us through the [Privacy Portal](#) using our service form or send a message to the following email:  encarregado@senior.com.br